STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY
OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

August 26, 2026

Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 26-06-04 – IMPLEMENTATION OF CLEAN ENERGY SUCCESSOR PROGRAMS

Dear Commissioners,

The Office of Education, Outreach, and Enforcement (EOE) respectfully submits these Written Comments to the Public Utilities Regulatory Authority (Authority) in response to the Notice of Request for Written Comments dated July 28, 2026 (Notice),[1] specifically regarding Topic 4: "current RRES [and] NRES . . . Program rules that should be carried forward, as well as those that should be modified, in successor programs.

1. Non-Residential Renewable Energy Solutions (NRES) Program and its successor program

As the Authority has recognized:

> Interconnection remains one of the most persistent and multifaceted barriers to DER deployment in Connecticut. Challenges related to lengthy timelines, high and uncertain upgrade costs, cost-allocation methodologies, conservative utility modeling assumptions, and limited incentives for EDCs to proactively plan and complete system upgrades all continue to constrain project development.

Legislative Report, Feb. 27, 2026, Docket No. 25-02-14, Renewable Energy Tariff Program Successor Study, p. 119. In EOE's role as the Interconnection Ombudsperson, EOE has repeatedly seen interconnection issues in disputes brought to mediation. In light of the known interconnection barriers and EOE's observation of the same, EOE provides the following for consideration in addressing interconnection issues in the clean energy non-residential successor program.

[1] The Notice initially requested comments by August 12, 2026. However, in its Ruling on Motion No. 13, the Authority extended the deadline for all parties to August 26, 2026.

a. Interconnection costs vary greatly from estimate to post-interconnection "true-up"

It is EOE's understanding that, under the standard non-residential interconnection agreements (IA),[2] developers are required to pay for all "interconnection costs," which includes costs for testing, communications infrastructure, upgrade costs, and maintenance and other costs. IA § 5.1. The same is true for "distribution upgrades." IA § 5.6.

While the electric distribution companies (EDCs) provide an initial cost estimate to developers with the IA, that estimate can be of little use by the time the project interconnects. One reason can be that a significant amount of time has passed since the IA was presented and the state of the "grid" may be quite different than when the estimate was provided. Sometimes, the estimate becomes inaccurate because of changes the developer makes to the project. At other times, the EDCs may provide an erroneous estimate that is not accurate even at the time it is provided.

Regardless of the reason the estimate is not aligned with actual costs, once the EDCs incur the "interconnection costs," they are billed directly to the developer, who is required to pay them in order to interconnect. The most egregiously inaccurate estimate EOE has seen in its role as the Interconnection Ombudsperson was an increase of approximately 3,000%. Unfortunately, in the current NRES program, there does not appear to be any recourse for developers, or their financial investors, as the "interconnection costs" are a direct pass-through from the EDCs to the developer. If the developers want to complete their project, in which they have invested substantial sums of money, they feel they have no choice but to pay the full interconnection costs.

b. Upgrade costs regarding poles owned by third-party custodians are not included in EDC cost estimates and may be entirely unknown (and unknowable) by developers

Cost estimates for interconnection upgrades provided by the EDCs are limited to the EDCs' costs, which would include any costs associated with poles for which the EDCs are custodians. However, many poles have a third-party custodian, and costs for those poles are not included in the EDC estimates, nor is any information regarding the absence of those costs. As far as EOE is aware, there is no way for a developer to be on notice that additional pole costs could be incurred nor any way for a developer to identify the pole custodian.

The most troubling instance of these "hidden" interconnection costs seen by EOE as the Interconnection Ombudsperson involved an additional $350,000+ of costs associated with replacement of poles owned by a third-party custodian. These possible additional costs were not shared by the EDC with the developer. Rather, the developer received an invoice directly from the third-party pole custodian after the developer paid

[2] Standard Fast Track and Study Process Generator Interconnection Agreement.

to the EDC multiple millions of dollars in interconnection upgrade costs to be incurred by the EDC for the developer's project. Once again, if developers want to complete their projects, in which they have invested substantial sums of money, they feel compelled to pay the full interconnection costs, no matter how unexpected or "unfair" they may seem.

In the clean energy non-residential successor program, EOE suggests that all upgrade costs, including those of third-party pole custodians, should be included in the estimate provided by the EDCs. The EDCs are the only parties in possession of the information regarding both the proposed project and the pole custodian(s). Thus, because all the pole upgrade costs are in aid of interconnection, the EDCs should be responsible for providing an estimate for those costs, as obtained from the third-party custodian. At the very least, the EDC should provide notice to the developer that the pole custodian is a third-party and direct the developer to contact that third-party to obtain an estimate.

c. Interconnection timeline delays based on lack of communication

A majority of the disputes EOE handles as the Interconnection Ombudsperson are the result of timeline delays and the perceived lack of communication developers receive from the EDCs throughout the interconnection process. Communication breakdowns can occur when either party – developer or EDC – fails to provide requested information. EOE recognizes that only developers reach out to the Interconnection Ombudsperson when communication breaks down, which can make it appear as if all the communication problems are the result of EDC failures. While this cannot be presumed, the EDCs sometimes fail to timely and effectively communicate during projects, and sometimes for months on end, for reasons that EOE has been unable to fully understand.

The primary complaint is that developers repeatedly reach out for updates and receive none. Failures include lack of timely: countersignatures on IAs, cost updates, study results, updates to study schedules, revised documentation, accurate documentation, responses to project changes, and status updates.

As the Authority develops clean energy successor programs, it should consider ways to decrease timeline delays, including delays based on lack of EDC communication, possibly by holding the EDCs accountable in some way for unnecessarily causing delays, e.g. fines, inability to recover costs in rate base, etc.

d. Changes required in prior Authority decisions that should carry forward to the clean energy non-residential successor program

EOE suggests that the proposals recommended in the 100-Day Sprint Working Group Report[3] (Sprint Report), which were adopted and accepted by the Authority in

[3] 100-Day Sprint Working Group Report, Dec. 20, 2024, Docket No. 17-12-03RE06, available at Docketed Correspondence for [17-12-03RE06] Final Sprint Report.

Docket No. 25-01-27, should carry forward to the successor program to the extent they remain applicable in the new program. To summarize, those proposals included updates to (1) PowerClerk and EDC data, (2) interconnection timelines, (3) EDC processes and procedures, and (4) timelines and cost estimates. Following its review of the Sprint Report, the Authority made clear in its decisions in Docket No. 25-01-27 which proposals the EDCs were to implement. Interim Decision, Mar. 26, 2025, Docket No. 25-01-27, PURA Investigation into Interconnection Process Modifications, pp. 7-11, 28-30; Final Decision, Aug. 20, 2025, Docket No. 25-01-27, PURA Investigation into Interconnection Process Modifications, pp. 7-8, 14-17, 50-54.

EOE notes that, in its role as a facilitator in the Interconnection Working Group (IXWG), EOE has heard developers complain of several proposals that developers believe the EDCs have not implemented fully and/or correctly. Without commenting on the accuracy of the complaints, EOE provides the following examples from developer members of the IXWG:

1. Failure to implement or implement with full functionality the "chess clock" in Power Clerk (Sprint Report Proposal #5; Final Decision, Aug. 20, 2025, Docket No. 25-01-27, Order No. 10).

2. Failure to resolve communications issues through an *effective* single point of contact (POC), even though a POC has been provided for each project (Sprint Report Proposals # 15, 17, 19; Interim Decision, Mar. 26, 2025, Docket No. 25-01-27, Order No. 1).

3. Failure to fully implement solutions regarding the processes for installing and paying for incentive meters (Sprint Report Proposal # 33; Final Decision, Aug. 20, 2025, Docket No. 25-01-27, Order No. 13).

4. Failure to timely and continually update hosting capacity maps.

To the extent any proposals ordered to be implemented in Docket No. 25-01-27 have not been fully or accurately implemented, EOE recommends that the Authority hold the EDCs accountable and carry forward such requirements – fully implemented – in the successor program.

Lastly, EOE recommends that any clean energy successor program includes flexible interconnection, bidirectional EV charging interconnection, and coordination with the successor energy storage program such that consumers can benefit from all programs in order to further the state's clean energy goals. See, e.g., IXWG Meeting Summary, Feb. 10, 2026 (discussing flexible interconnection, bidirectional EV charging, and energy storage projects), available at CT IXWG 7/10/26 Meeting Summary; [4] IXWG Meeting Summary, Mar. 10, 2026 (discussing flexible interconnection and bidirectional

[4] All IXWG meeting summaries are available on the Authority's website at Interconnection Technical Working Group and Interconnection Policy Working Group. Note that the two groups (technical and policy) meet together and summaries for all meetings are posted on both webpages.

EV charging), available at CT IXWG 3/10/26 Meeting Summary; IXWG Meeting Summary, Apr. 7, 2026 (discussing EDC straw proposal for interconnecting bidirectional EVs), available at CT IXWG 4/7/26 Meeting Summary; IXWG Bidirectional EV Interconnection Subgroup Meeting Summary, May 1, 2026, available at CT IXWG 5/1/26 BEV Subgroup Meeting Summary.

2. Residential Renewable Energy Solutions (RRES) Program and its successor program

EOE supports the Authority's recommendations for the clean energy residential successor program, including "(1) comprehensive upfront licensing requirements for solar contractors, retailers, and installers; and (2) ongoing contractor compliance and auditing to ensure that companies are adhering to program rules, CUTPA, and any other applicable regulations." Legislative Report, Feb. 27, 2026, Docket No. 25-02-14, Renewable Energy Tariff Program Successor Study, p. 56.

EOE brings to the Authority's attention that, since the Authority's implementation of the RRES contractor compliance obligations in the annual dockets (No. 2X-08-02RE01) (Contractor Compliance Dockets), some solar companies have removed their sales and marketing departments from within their solar companies so that the sales and marketing company and the installation company are two separate legal entities. This results in the solar installation company, over which the Authority has jurisdiction through the RRES application process, having no marketing or training materials to file in the Contractor Compliance Dockets and thus circumvent the protections provided to customers in those dockets. In addition, after receiving strikes in the annual Contractor Compliance Dockets, which prohibit a company from submitting RRES applications, EOE has been made aware of one company who is apparently filing its applications through a separate entity that did not receive a strike, also circumventing the protections provided to customers in the Contractor Compliance Dockets. While the recent Public Act 26-16 will hopefully remedy some of these problems and hold solar sales and marketing companies accountable, EOE nonetheless wants to make the Authority aware of these issues as it contemplates the clean energy residential successor program.

EOE also notes for the Authority's consideration that the EDCs may not have fully implemented the Authority's directions regarding the use of meter socket adaptors (MSAs) as required by the Authority. Final Decision, Order No. 32, Nov. 1, 2023, Docket No. 23-08-08, Annual Residential Renewable Energy Solutions Program Review – Year 3 (requiring compliance filings in Dockets No. 23-08-02 and 23-08-05); Final Decision, Orders No. 26 and 27, Oct. 16, 2025, Docket No. 24-08-02, Annual RRES Program Review – Year 4. In its role as a facilitator in the IXWG, EOE has heard developers comment that the EDCs' meter diagrams and implementation of the MSA program essentially prohibit the use of any MSAs. Without commenting on the accuracy of the complaints, EOE provides the following information for the Authority's consideration in assessing the implementation of the use of MSAs.

The EDCs filed their compliance documents in accordance with the applicable orders regarding MSA implementation; however, MSAs were routinely being rejected in April 2025. See Final Decision, Dec. 17, 2025, Docket No. 25-08-02, Annual RRES Program Review – Year 5, Order No. 21 and p. 26 (referring to Tesla's comments that UI's metering requirements effectively contravene the use of MSAs); Correspondence from ConnectDER and Tesla, Apr. 17, 2025, Docket No. 24-08-02, Annual RRES Program Review – Year 4 (summarizing reasons for delays); see also IXWG MSA Subgroup Meeting Summary, Jan. 14, 2025, available at CT IXWG 1/14/25 MSA Subgroup Meeting Summary; IXWG MSA Subgroup Meeting Summary, Feb. 6, 2025, available at CT IXWG 2/6/25 MSA Subgroup Meeting Summary. In light of the difficulties in receiving approval from the EDCs to utilize MSAs in residential clean energy projects, and the limited capacity in which they are currently being allowed, EOE recommends that the use of MSAs be more fully implemented in the clean energy residential successor program to enable customers to save substantial costs associated with other methods of interconnection and wiring.

EOE thanks the Authority for its thoughtful and thorough consideration of EOE's prior recommendations regarding the RRES program requirements. See EOE Written Comments, May 9, 2025, Docket No. 25-02-14, Renewable Energy Tariff Program Successor Study;[5] EOE Written Comments, Dec. 12, 2025, Docket No. 25-02-14, Renewable Energy Tariff Program Successor Study;[6] EOE's Brief, Oct. 22, 2025, Docket No. 25-08-02, Annual RRES Program Review – Year 5;[7] and Contractor Compliance Working Group (CCWG) Report submitted by EOE on behalf of the CCWG, Docket No. 25-08-02, Annual RRES Program Review – Year 5, and Docket No. 26-08-02, Annual RRES Program Review – Year 6.[8] EOE wishes to thank the Authority for its adoption of many of EOE's prior recommendations in the current RRES program and recommends that these same improvements carry forward into the clean energy residential successor programs.

Lastly, EOE thanks the Authority for the opportunity to comment on these issues.

Sincerely,

PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach, and Enforcement

[5] Available at 25-02-14 EOE Written Comments.

[6] Available at 25-02-14 EOE Written Comments 4.

[7] Available at EOE Brief for 25-08-02 filed 10/22/2025.

[8] EOE Correspondence with CCWG Final Report, March 31, 2026, Docket No. 26-08-02, available at Docketed Correspondence for 26-08-02 - CCWG Final Report (also filed in Dkt No. 25-08-02).

CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Sincerely,

By: /s/ Jamie Spannhake

Jamie Spannhake
Staff Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement